

MULLIN HOARD & BROWN, L.L.P.

David R. Langston, SBN: 11923800

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Former Counsel for Debtors, Reagor-Dykes

Motors, LP; Reagor-Dykes Imports, LP;

Reagor-Dykes Amarillo, LP; Reagor-Dykes

Auto Company, LP; Reagor-Dykes

Plainview, LP; Reagor-Dykes Floydada, LP

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

IN RE:	§	
	§	
REAGOR-DYKES MOTORS, LP	§	Case No. 18-50214-rlj11
Debtor.	§	
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IN RE:	§	
	§	
REAGOR-DYKES IMPORTS, LP	§	Case No. 18-50215-rlj11
Debtor.	§	(Jointly Administered Under
		Case No. 18-50214)
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IN RE:	§	
	§	
REAGOR-DYKES AMARILLO, LP	§	Case No. 18-50216-rlj11
Debtor.	§	(Jointly Administered Under
		Case No. 18-50214)
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IN RE:	§	
	§	
REAGOR-DYKES AUTO COMPANY, LP	§	Case No. 18-50216-rlj11
Debtor.	§	(Jointly Administered Under
		Case No. 18-50214)
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IN RE:	§	
	§	
REAGOR-DYKES PLAINVIEW, LP	§	Case No. 18-50218-rlj11
Debtor.	§	(Jointly Administered Under
		Case No. 18-50214)
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IN RE:	§	
	§	
REAGOR-DYKES FLOYDADA, LP	§	Case No. 18-50219-rlj11
Debtor.	§	(Jointly Administered Under
		Case No. 18-50214)

WITNESS AND EXHIBIT LIST OF MULLIN HOARD & BROWN, L.L.P.
FOR HEARINGS SCHEDULED FOR OCTOBER 5, 2018

NOW COMES, Mullin Hoard & Brown, L.L.P. (“MHB”), and files this, its Amended Witness & Exhibit List For Hearings Scheduled for October 5, 2018.

WITNESSES

MHB discloses that they may call the following individuals to provide testimony:

1. Lyndon James, Senior Partner, BlackBriar Advisors, LLC
2. Bob Schleizer, Managing Partner, BlackBriar Advisors, LLC
3. Bart Reagor, Owner
4. Rick Dykes, Owner
5. David R. Langston, Partner, Mullin Hoard & Brown, L.L.P.
6. Brad W. Odell, Partner, Mullin Hoard & Brown, L.L.P.
7. Keith Langley, attorney for Ford Motor Credit
8. Louis Phillips, attorney for Bart Reagor
9. Tom Kirkendall, attorney for Rick Dykes
10. Timothy Conner, CPA, Accounting Manager
11. Brad Fansler, Administration Director
12. Steve Reinhart, Legal/Compliance Director, Facilities Director, New Construction Manager

MHB reserves the right to amend this Witness List and to call other witnesses as may be necessary for rebuttal or impeachment purposes. MHB also reserves the right to call any witnesses designated or called by any other party to these proceedings.

EXHIBITS

MHB discloses that they may introduce the following exhibits:

TAB	DESCRIPTION
1.	Engagement letter between Mullin Hoard & Brown, L.L.P. and Debtors dated August 6, 2018
2.	Engagement letter between Mullin Hoard & Brown, L.L.P. and Reagor Auto Mall, Ltd. and Reagor-Dykes Snyder, LP dated August 10, 2018
3.	Copies of retainer checks paid by Rick Dykes and Bart Reagor individually in the amount of \$250,000 each, along with deposit tickets.

TAB	DESCRIPTION
4.	Termination letter from Debtors to Mullin Hoard & Brown, L.L.P. dated August 21, 2018, along with email dated August 23, 2018 forwarding same.
5.	Resolution of Reagor-Dykes Motors, LP dated July 31, 2018
6.	Resolution of Reagor-Dykes Imports, LP dated July 31, 2018
7.	Resolution of Reagor-Dykes Amarillo, LP dated July 31, 2018
8.	Resolution of Reagor-Dykes Auto Company, LP dated July 31, 2018
9.	Resolution of Reagor-Dykes Plainview, LP dated July 31, 2018
10.	Resolution of Reagor-Dykes Floydada, LP dated July 31, 2018
11.	Resolution of Reagor-Dykes Snyder, LP dated August 10, 2018
12.	Resolution of Reagor Auto Mall, Ltd. dated August 10, 2018
13.	Notice of Appearance and Request For Notice of Louis M. Phillips on behalf of Bart Reagor dated August 9, 2018 [Docket #53]
14.	Response to Order to Show Case in Case No. 5:187-cv-00186; Ford Motor Credit Company, LLC v. Reagor-Dykes Amarillo, L.P., et. al dated August 6, 2018, filed by counsel for Reagor-Dykes II, L.L.C., Reagor-Dykes Auto Mall I, L.L.C., Reagor-Dykes III, L.L.C., Bart Reagor and Rick Dykes.

MHB reserves the right to amend this Exhibit List in order to supplement the list of documents that may be introduced. MHB also reserves the right to introduce other exhibits as may be necessary for impeachment purposes. MHB also reserves the right to introduce exhibits designated by any other party to these proceedings.

Respectfully Submitted,

MULLIN HOARD & BROWN, L.L.P.

P.O. Box 2585

Lubbock, Texas 79408-2585

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/s/ David R. Langston

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Auto Company, LP; Reagor-Dykes

Plainview, LP; Reagor-Dykes Floydada, LP

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion was served on the following parties in interest via Email and/or ECF on this 2nd day of October 2018:

1. Reagor Dykes Auto Group
1215 Ave. J
Lubbock, Texas 79401
2. U.S. Trustee's Office
Attn: Stephen McKitt
1100 Commerce St., Room 9C60
Dallas, Texas 75242
Email: Stephen.McKitt@usdoj.gov
3. Mr. Bart Reagor
Managing Member of the Debtors and non-debtors
General Partners
1215 Ave. J
Lubbock, Texas 79401
Email: breagor@aol.com
4. Mr. Rick Dykes
Managing Member of the Debtors and non-debtors
General Partners
1215 Ave. J
Lubbock, Texas 79401
Email: dykesrick@yahoo.com
5. Louis Phillips
Kelly Hart & Pitre
301 Main Street, Suite 1600

Baton Rouge, LA 70801
Email: Louis.Phillips@kellyhart.com

6. Tom Kirkendall
Law Offices of Tom Kirkendall
2 Violetta Ct.
The Woodlands, TX 77381
Email: bigkirk@kir.com
7. Bob Schleizer
BlackBriar Advisors LLC
3131 McKinney Ave., #600
Dallas, TX 75204
Email: bschleizer@blackbriaradvisors.com
8. Marcus Helt
Foley & Lardner, LLP
2021 McKinney Ave., Suite 1600
Dallas, TX 75201
Email: mhelt@foley.com
9. Keith Langley and Brandon Bains
Langley LLP
1301 Solana Blvd.
Bldg. 1, Suite 1545
Westlake, Tx. 76262
Email: klangley@l-llp.com
Email: bbains@l-llp.com
10. Donald Cram and Duane M. Geck
Severson & Werson
One Embarcadero Center, Suite 2600
San Francisco, CA 94111
Email: dmg@severson.com
Email: dhc@severson.com
11. All parties receiving notice via ECF in this case.

/s/ David R. Langston
David R. Langston